

NZCT Statement on Ethics and Fraud

I am proud to be the Chief Executive Officer of the New Zealand Community Trust (NZCT) and proud of the contribution NZCT makes to sport and active recreation in New Zealand. NZCT's values are the guiding principles of what constitutes acceptable behaviour. We are mindful of our corporate social responsibilities and take all reasonable steps to minimise harm which may be caused by gambling.

NZCT is committed to conducting its business to the highest ethical standards and has a zero tolerance policy regarding fraud and corruption. NZCT's code of conduct and fraud policies expect all employees, stakeholders, third parties, subcontractors, consultants, suppliers, and representatives to operate in an ethical manner at all times, and to comply with all relevant NZCT policies regardless of where they operate. NZCT has a number of detailed and comprehensive policies on fraud, whistle-blowing, gifts and gratuities, and conflicts of interests, among others. A high-level summary of those policies are:

Reporting

The Chief Executive Officer is the point of contact for employees and external stakeholders for all ethical and fraud considerations. NZCT encourages reporting of any unethical behaviour or fraudulent behaviour from both internal and external sources. All information received confidentially will remain confidential to the extent that it is lawfully possible to do so. Employees acting in good faith are encouraged to report any possible fraudulent activity, misappropriation or other inappropriate conduct without fear of reprisal.

Unethical Payments

NZCT does not permit the making, offering, or receipt of any inappropriate payment, facilitation payment, reward or any other improper inducement either directly or indirectly to any person. No intermediaries such as agents, subcontractors, consultants, and other third parties shall be knowingly used, directly or indirectly, to channel inappropriate payments to any person.

Training

NZCT ensures that its employees, stakeholders and third parties are aware of the types of improprieties that might occur within their areas of operation by providing fraud awareness training and regular communications.

Conflict of Interest

It is NZCT policy that employees and/or consultants, agents or intermediaries acting on behalf of NZCT must be free from conflicts of interest. At NZCT, we take this very seriously and any perceived or actual conflict must be declared promptly to enable any risk associated with any conflict to be mitigated or eliminated as appropriate.

Gifts and Gratuities

As the acceptance of gifts and gratuities could be construed to the detriment of NZCT's reputation, no employee or trustee, or immediate family member, may accept any gift or gratuity if doing so can be reasonably construed as being likely to influence improperly the business conduct of the employee or trust.

Any gifts and hospitality must have a justifiable business reason, and must not be given to obtain preferential treatment from the recipient. Cash or cash equivalent must not be given.

Investigation and Reporting

The Chief Executive Officer has the primary responsibility for investigating all suspected fraudulent activity, misappropriation or other inadequate conduct. Whenever fraud or dishonesty is identified, the matter will be reported to the appropriate authority.

Internally and externally we are focused on conducting our business in an ethical manner that is free from fraud and corruption. Our ethical framework and our efforts around prevention, detection and responses to fraud benefit both NZCT and the communities we support.

Mike Knell
Chief Executive Officer